

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CIRBA INC. (d/b/a DENSIFY) and CIRBA IP,  
INC.,

*Plaintiff/Counter-Defendant*

v.

VMWARE, INC.,

*Defendant/Counter-Plaintiff.*

C.A. No. 19-742-LPS

**VMWARE, INC.'S NOTICE OF DEPOSITION OF  
RAY BOOTS**

**PLEASE TAKE NOTICE** that, under Rules 26 and 30 of the Federal Rules of Civil Procedure, on a date to be mutually agreed upon by the parties, at 9:00 a.m. Pacific or another time mutually agreed upon by the parties, Defendant VMware, Inc. (“VMware”), by and through its attorneys, will take the deposition by oral examination of Ray Boots. The deposition will be conducted via video link to be sent from TSG Reporting, 228 E. 45th Street, Suite 810, New York, NY 10017, to the witness and his attorneys, who may appear remotely, or by other means and/or at any other place that may be agreed upon by the parties.

The examination will take place before a notary public or other person authorized to administer oaths and will continue until completed. The testimony at the deposition will be recorded by videographic, audio, audiovisual, video conferencing, stenographic, and/or real-time computer means from a remote location separate from the deponent.

Dated: November 4, 2020

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

OF COUNSEL:

Arturo J. González  
Michael A. Jacobs  
Richard S. J. Hung  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105  
(415) 268-7000  
agonzalez@mofo.com  
mjacobs@mofo.com  
rhung@mofo.com

Bitra Rahebi  
MORRISON & FOERSTER LLP  
707 Wilshire Boulevard  
Los Angeles, CA 90017  
(213) 892-5200  
brahebi@mofo.com

Scott F. Llewellyn  
MORRISON & FOERSTER LLP  
4200 Republic Plaza  
370 Seventeenth Street  
Denver, CO 80202-5638  
(303) 592-2204  
sllewellyn@mofo.com

/s/ Robert M. Vrana

Anne Shea Gaza (No. 4093)  
Robert M. Vrana (No. 5666)  
Samantha G. Wilson (No. 5816)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
agaza@ycst.com  
rvrana@ycst.com  
swilson@ycst.com

*Attorneys for VMware, Inc.*

**CERTIFICATE OF SERVICE**

I, Robert M. Vrana, hereby certify that on November 4, 2020, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Kenneth L. Dorsney, Esquire  
Morris James LLP  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
*kdorsney@morrisjames.com*

*Attorney for Plaintiffs/Counter-Defendants*

I further certify that on November 4, 2020, I caused the foregoing document to be served via electronic mail upon the above-listed counsel and on the following:

Courtland L. Reichman, Esquire  
Shawna L. Ballard, Esquire  
Jennifer Estremera, Esquire  
Michael G. Flanigan, Esquire  
Kate Falkenstien, Esquire  
Ariel C. Green, Esquire  
Reichman Jorgensen LLP  
100 Marine Parkway, Suite 300  
Redwood Shores, CA 94065

Sarah O. Jorgensen, Esquire  
Reichman Jorgensen LLP  
1201 West Peachtree Street, Suite 2300  
Atlanta, GA 30309

Christine E. Lehman, Esquire  
Adam Adler, Esquire  
Reichman Jorgensen LLP  
818 Connecticut Ave., N.W., Suite 850  
Washington, DC 20006

Jaime F. Cardenas-Navia, Esquire  
Wesley Lanier White, Esquire  
Khue V. Hoang, Esquire  
Rahul Sarkar, Esquire  
Reichman Jorgensen LLP  
750 Third Avenue, Suite 2400  
New York, NY 10017

*RJ\_densify@reichmanjorgensen.com*

Gary J. Toman, Esquire  
Weinberg Wheeler Hudgins Gunn & Dial  
3344 Peachtree Road NE, Suite 2400  
Atlanta, GA 30326  
*gtoman@wwhgd.com*

Peter J. Ayers, Esquire  
Law Office of Peter J. Ayers, PLLC  
2200 Bowman Avenue  
Austin, TX 78703  
*peter@ayersiplaw.com*

Paul D. Clement, Esquire  
Julie M.K. Siegal, Esquire  
Kirkland & Ellis LLP  
1301 Pennsylvania Avenue, N.W.  
Washington, DC. 20004  
*paul.clement@kirkland.com*  
*julie.siegal@kirkland.com*

*Attorneys for Plaintiffs/Counter-Defendants*

Dated: November 4, 2020

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

*/s/ Robert M. Vrana*

Anne Shea Gaza (No. 4093)  
Robert M. Vrana (No. 5666)  
Samantha G. Wilson (No. 5816)  
Rodney Square  
1000 N. King Street  
Wilmington, Delaware 19801  
*agaza@ycst.com*  
*rvrana@ycst.com*  
*swilson@ycst.com*  
*Attorneys for VMware, Inc.*